REMARKS

Claims 1-19 remain pending in this application for which applicant seeks reconsideration.

Amendment

Claims 1, 3, 5, 10-12, 14, and 19 have been amended to improve their form and readability, as well as to overcome the § 112 rejection. Applicant believes that substantially all of the changes made to the claims are directed toward improving readability and form. Moreover, each of claims 1, 10, and 19 now specifies that the same predetermined identifier is associated with each of the plurality of transmissions of the same data. See page 12, lines 10-16, for support.

Non-Art Rejection

Claims 1-19 were rejected under 35 U.S.C. § 112, second paragraph, because the apparatus claims allegedly omit essential structural cooperative relationships between the claimed elements, and certain claim languages are deemed vague. Applicant amended the claims to improve their form, readability, and understandability. Perhaps that in itself may overcome this rejection. Nonetheless, applicant traverses this rejection to the extent that the original claims do not lack essential structural cooperative relationships, especially since the structural claims are written in a "means-plus-function" format. The burden lies squarely with the examiner as to explain precisely what essential structural cooperative relationships between the claimed elements are missing. As the examiner failed to do precisely that, the examiner needs to revisit this rejection and either withdraw it or identify exactly what the allegedly missing essential structural cooperative relationships are. As the examiner has not clearly established that the claims are indefinite, applicant submits that this rejection is improper.

Allowable Claims

Claims 10-18 have not been rejected based on prior art. Accordingly, applicant has constructed this to mean that they are allowable over prior art.

Art Rejection

Claims 1-9 and 19 were rejected under 35 U.S.C. § 102(b) as anticipated by Johnson (USP 6,248,996). Applicant traverses this rejection because Johnson does not disclose or teach associating a same predetermined identifier to each of the plurality of transmissions of the same data.

Each of claims 1, 10, and 19 calls for managing information relating to the transmission by associating a same predetermined identifier to each of the plurality of transmissions of the same data. Thus, in the claimed invention, a single identifier is used to transmit the same data to a plurality of destinations using different transmission modes or methods. See page 12, lines 10-16 of the present disclosure.

In contrast, Johnson uses different identifiers for different transmissions of the same data. Johnson discloses, referring to Figs. 2 and 3, a scanner 10 that can select a plurality of receiver destination addresses (step 22). Different job numbers or IDs are assigned to different destination addresses. Then, connections between the scanner 10 and the destination addresses are made (step 26) to determine the type and availability of each receiver destination. Specifically, Johnson generates different files 50, 52, 54 from scanned an image (same document). Then, different files (different data types) are sent simultaneously to different destinations based on different job numbers or IDs assigned to different destinations.

As Johnson uses different assigning numbers to different transmission, Johnson would not have anticipated the claimed invention.

Conclusion

Applicant submits that claims 1-19 patentably distinguish over the applied references and thus urges the examiner to issue an early Notice of Allowance. Should the examiner have any issues concerning this reply or any other outstanding issues remaining in this application, applicant urges the examiner to contact the undersigned to expedite prosecution.

Respectfully submitted,

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